

McElroy, Deutsch, Mulvaney & Carpenter, LLP  
88 Pine Street – 24<sup>th</sup> Floor  
New York, New York 10005  
(212) 483-9490  
Scott A. Levin

Attorneys for Plaintiff,  
The Travelers Indemnity Company

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

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THE TRAVELERS INDEMNITY COMPANY,	:
SUCCESSOR IN INTEREST BY MERGER TO	:
GULF INSURANCE COMPANY,	:
	: Civil Action No.: 07-CV-4032
Plaintiff,	: (NRB)
	:
- against -	: <b>NOTICE OF MOTION</b>
	: <b>FOR DEFAULT JUDGMENT</b>
	: <b>AGAINST MODERN</b>
MODERN INDUSTRIES, INC., RONEN KOZOKHAR	: <b>INDUSTRIES, INC.</b>
and ALLA KRASNER	:
	:
	:
	:
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TO: Modern Industries, Inc.  
120 49<sup>th</sup> Street  
Brooklyn, New York 11232

Alla Krasner  
c/o Michael A. Freeman, Esq.  
24 West 40<sup>th</sup> Street, 17<sup>th</sup> Floor  
New York, New York 10018

Ronen Kozokhar  
c/o Michael Sucher, Esq.  
26 Court Street  
Brooklyn, New York 11242

**PLEASE TAKE NOTICE** that, on March 28, 2008, or as soon as counsel may be heard, the undersigned, attorneys for plaintiff, The Travelers Indemnity Company, successor in interest by merger to Gulf Insurance Company ("Travelers"), will move before the Hon. Naomi R.

Buchwald, U.S.D.J., at the United States District Court for the Southern District of New York, 500 Pearl Street, New York, New York, 10007, for an Order granting final judgment by default against defendant, Modern Industries, Inc.; and

**PLEASE TAKE FURTHER NOTICE** that, in support of the within motion, Travelers shall rely upon the Complaint filed in this matter, the Request to Enter Default against defendant, Modern Industries, Inc. dated August 6, 2007, the Clerk's Certificate of Default dated January 22, 2008 and the Affidavit of R. Jeffrey Olson in support of the present motion; and

**PLEASE TAKE FURTHER NOTICE** that at the time and place aforesaid, Travelers will request that the proposed form of final judgment submitted herewith be entered by the Court.

McElroy, Deutsch, Mulvaney  
& Carpenter, LLP  
Attorneys for Plaintiff,  
The Travelers Indemnity Company,  
successor in interest by merger to  
Gulf Insurance Company



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Scott A. Levin

Dated: New York, New York  
February 11, 2008